

BROWN GAVALAS & FROMM LLP  
Attorneys for Defendants  
AMERICAN STEAMSHIP OWNERS  
MUTUAL PROTECTION AND  
INDEMNITY ASSOCIATION, INC. and  
SHIPOWNERS CLAIMS BUREAU, INC.  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GREAT LAKES INSURANCE SE  
IN ITS OWN RIGHT AND/OR AS  
SUBROGEE OF PACIFIC GULF  
SHIPPING CO.,

Case No.: 1:19-cv-10656 (RA)(SLC)

*Plaintiff,*

-against-

**NOTICE OF MOTION TO  
DISMISS THE COMPLAINT**

AMERICAN STEAMSHIP OWNERS  
MUTUAL PROTECTION AND  
INDEMNITY ASSOCIATION, INC.  
A/K/A THE AMERICAN CLUB,  
SHIPOWNERS CLAIMS BUREAU, INC.,  
GEORGE GOURDOMICHALIS, AND  
EFSTATHIOS GOURDOMICHALIS,

*Defendants.*

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**PLEASE TAKE NOTICE** that Defendants, AMERICAN STEAMSHIP OWNERS  
MUTUAL PROTECTION AND INDEMNITY ASSOCIATION, INC. and SHIPOWNERS  
CLAIMS BUREAU, INC., will move this Court before the Honorable Ronnie Abrams, at the  
United States Courthouse located at 40 Foley Square, New York, New York, at a date and time  
to be set by the Court, for an Order, pursuant to Rules 9, 12, 37 and 65 of the Federal Rules of  
Civil Procedure as well as the inherent power of the Court to fashion appropriate remedies for

violation of a protective order, dismissing the Complaint in its entirety, awarding attorneys' fees in connection with this motion and granting such further and different relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that opposition papers are required to be served and filed in accordance with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

Dated: New York, New York  
December 12, 2019

BROWN GAVALAS & FROMM LLP  
Attorneys for Defendants  
AMERICAN STEAMSHIP OWNERS  
MUTUAL PROTECTION AND  
INDEMNITY ASSOCIATION, INC.  
A/K/A THE AMERICAN CLUB and  
SHIPOWNERS CLAIMS BUREAU, INC.

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